

**UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA**

TAWAINNA ANDERSON, Individually
and as Administratrix of the ESTATE
OF NYLAH ANDERSON, a deceased
minor,

Plaintiff,

vs.

TIKTOK INC. AND BYTEDANCE,
INC.,

Defendants.

Case No.: 2:22-cv-01849-PD

**DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION
FOR LEAVE TO AMEND COMPLAINT**

Defendants TikTok Inc. and ByteDance Inc. (collectively, "TikTok") hereby submit the following response in opposition to Plaintiff's Motion for Leave to Amend Complaint (ECF No. 33). The Court should stay this case, including any consideration of Plaintiff's proposed amendment, until the Judicial Panel on Multidistrict Litigation resolves the conditional transfer of this action to the recently created multidistrict litigation, *In re: Social Media Adolescent Addiction/Personal Injury Product Liability Litigation*, MDL No. 3047. Alternatively, if the Court decides Plaintiff's motion on the merits, it should deny Plaintiff's proposed amendment as a bad faith, dilatory tactic to avoid transfer to the MDL.

The bases for TikTok's Response are set forth in detail in the attached Memorandum of Law, which is incorporated herein by reference along with the attached exhibits.

Dated: October 19, 2022

Respectfully submitted,

/s/ Joseph E. O'Neil

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